

## INSIGHTS ON REGULATION

## Foreign Account Tax Compliance Act (FATCA) Implementation Checklist

N.B.: Delegated FATCA obligations remain the responsibility of the fund

Objective	Fund	Northern Trust	Details
Governance			
Perform legal entity analysis	✓		Determine which legal entities have FATCA obligations and which do not; identify requirements; determine how each Foreign Financial Institution (FFI) will qualify as FATCA compliant
Appoint officer responsible for FATCA compliance	✓		Specific requirements may vary for Inter-Governmental Agreement (IGA) FFIs, non-IGA FFIs and deemed compliant FFIs
Enter into an agreement or register with the IRS, if required	✓		Specific requirements may vary for IGA FFIs, non-IGA FFIs and deemed compliant FFIs
Revise subscription forms and other legal documents to accommodate FATCA	<b>√</b>		In consultation with legal and tax advisors and Northern Trust
Complete new form W-8 or W-9 for the fund(s)	✓		Custodians, brokers and other financial services providers will require proof of FATCA compliance
Evaluate FATCA compliance of fund service providers, investments and counterparties	✓		
FATCA Operations (when fu	ınd delegate	s AML/KYC	and transfer agency to Northern Trust)
Perform high-level impact analysis	✓	✓	Northern Trust may assist in investor analysis
Perform AML/KYC		✓	
Collect & retain appropriate tax documentation for investors		✓	Northern Trust will assist the fund by facilitating the collection, storage, and retention of tax documentation
Verify Global Intermediary Identification Number (GIIN)		✓	Northern Trust will periodically verify with the IRS FATCA GIIN numbers provided by non-US financial institutions
Review US tax forms as required		✓	Northern Trust will evaluate US tax forms received from investors for internal consistency
Record each new investor's compliance status		✓	Northern Trust will record each investor's compliance status, based on documentation provided
Record FATCA compliance of each pre-existing investor		✓	Northern Trust will record each investor's compliance status, based on documentation provided
Continuously monitor investors for changes in circumstances	✓	✓	Obligation of the fund; Northern Trust may assist
Report on US investors and investors not compliant with FATCA		✓	Obligation of the fund; Northern Trust may assist. Exceptions may apply for funds treated as a partnership under US law
Withhold on investors not compliant with FATCA		✓	Obligation of the fund; Northern Trust may assist. Exceptions may apply for funds treated as a partnership under US law





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2013	2014	2015	2016	2017	
H	19 Aug 13 1 Jan 14				ongoing
Registration*	IRS registration portal opens	Beginning 1 Jan 14 - GIINs issued   25 Apr 14 - registration deadline for inclusion first IRS FFI list   2 Jun 14 - first IRS FFI list published	usion first IRS FFI list   2 Jun 14 - first IRS FFI lie	st published	
New Account Holders:		1 July 14			ongoing
Both Entity & Individual		Perform due diligence on all new account holders			
Pre-existing Entity		1 July 14 1 Jan 15			
Accounts: Prima Facie FFIs		Review prima facie			
Pre-existing High Value		1 July 14	2		
Individuals		Review high-value individual accounts			
Pre-existing Other:		1 July 14	1 July 16		
Both Entity & Individual		Review other account holders			
Withhold on US-source		1 July 14			ongoing
Income*		Withhold on non-compliant account holders; initially applies only to new account holders	applies only to new account holders		
Withhold on Gross				1 Jan 17	ongoing
Proceeds/Passtnru Payments*				To be confirmed	Q
Reporting to Tax		31 Mar 15		_	ongoing
Authorities*		Phased in ov	Phased in over time beginning with 2014 payments		

<sup>\*</sup> Requirements and/or timing may differ for FFIs in Model 1 IGA countries